

COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW WASHINGTON
WASHINGTON, DC 20004-2401 NEW YORK
TEL 202.662.6000 SAN FRANCISCO
FAX 202.662.6291 LONDON
WWW.COV.COM BRUSSELS

September 1, 2006

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001

Re: STB Ex Parte No. 646 (Sub-No. 1) – Simplified Standards
For Rail Rate Cases

Dear Secretary Williams:

Enclosed for filing in the above-captioned matter please find Union Pacific Railroad Company's Notice of Intent to Participate.

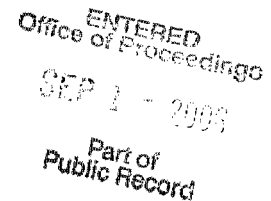
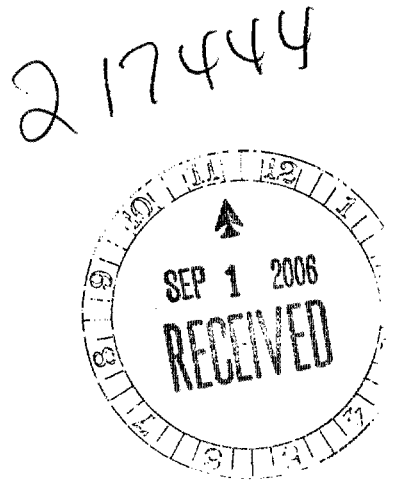
Thank you for your assistance.

Sincerely,



Michael L. Rosenthal

Enclosure



BEFORE THE
SURFACE TRANSPORTATION BOARD

STB Ex Parte No. 646 (Sub-No. 1)

SIMPLIFIED STANDARDS FOR RAIL RATE CASES

NOTICE OF INTENT TO PARTICIPATE

Pursuant to the Board's Decision served July 26, 2006, in the above-captioned matter, Union Pacific Railroad Company hereby files its notice of intent to participate in this proceeding as a party of record and requests that the in-house and outside counsel listed below be added to the official service list.

Respectfully submitted,



LINDA J. MORGAN
MICHAEL L. ROSENTHAL
Covington & Burling LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2401
(202) 662-6000

J. MICHAEL HEMMER
LOUISE A. RINN
GABRIEL S. MEYER
Union Pacific Railroad Company
1400 Douglas Street
Omaha, Nebraska 68179
(402) 544-5000

*Attorneys for Union Pacific Railroad
Company*

September 1, 2006